Select Special Freedom of Information and Protection of Privacy Act Review Committee

Preliminary Report

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Legislative Assembly of Alberta

Select Special Freedom of Information and
Protection of Privacy Act Review Committee
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103-01878/

MANDATE

On November 28, 2001, the Legislative Assembly of Alberta passed a motion appointing an all-party Committee to review the *Freedom of Information and Protection of Privacy Act*, to determine whether the *Act* and its supporting policy and administration provide an appropriate balance of access to information and protection of privacy, in accordance with the original intent; and to provide to the Assembly a report that includes any recommended amendments.

The Committee consists of:

Mr. Brent Rathgeber, Q.C., Edmonton-Calder, Chair
Mrs. Mary Anne Jablonski, Red Deer-North, Deputy Chair
Ms Debby Carlson, Edmonton-Ellerslie
Ms Alana DeLong, Calgary-Bow
Mr. Broyce Jacobs, Cardston-Taber-Warner
Mr. Thomas A. Lukaszuk, Edmonton-Castle Downs
Mr. Hugh MacDonald, Edmonton-Gold Bar
Mr. Brian Mason, Edmonton-Highlands
Mr. Gary Masyk, Edmonton-Norwood

INTRODUCTION

The *Freedom of Information and Protection of Privacy Act (FOIP Act)* was given royal assent in 1994 and came into force on October 1, 1995 for provincial government ministries. It was extended to school jurisdictions on September 1, 1998, to health care bodies on October 1, 1998, to post-secondary educational institutions on September 1, 1999, and to local government bodies on October 1, 1999.

The *Act* provides a right of access to records in the custody or under the control of a public body, including access by individuals to their own records, subject to specific and limited exceptions. The *Act* also establishes limitations to the collection, use and disclosure of personal information by public bodies, to protect the privacy of individuals.

In 1993, when Premier Klein introduced this legislation, he encouraged Albertans to present their views on it through an all-party Panel. The Panel recommended that three years after implementation of the *Act*, an all-party Legislative Assembly Committee be established to undertake a formal review. That Committee, which reported in 1999, recommended a second three-year review to allow local public bodies an early opportunity to comment on the application of the legislation after some experience with the *Act*. This recommendation was included in the *Act* as section 97.

This preliminary report presents the recommendations of the all-party Legislative Assembly Committee after its deliberations on the submissions received during the consultation process, as well as input from the Office of the Information and Privacy Commissioner, Alberta Government Services (the Department of Government responsible for administering the *Act*) and Alberta Justice.

In a number of cases the Committee was unanimous in its recommendation; in other cases, it was not possible to reach unanimous agreement and the recommendation represents the majority view. There were a few instances where the opinions that emerged from the consultation process were diametrically opposed and where the Committee aimed to find a balanced compromise.

The proceedings of the Select Special Freedom of Information and Protection of Privacy Act Review Committee are recorded in *Hansard* and are available online at: www.assembly.ab.ca.

THE PUBLIC CONSULTATION PROCESS

In March 2002, a Discussion Guide entitled "Looking Ahead" was distributed to help Albertans contribute to the review process. The Guide was distributed to more than 1,500 individuals, public bodies and other organizations. Over 125 submissions were received by the Committee, within the following categories:

Number	Category
47	Local Public Bodies
20	*Municipal Governments*
7	*Health Care Bodies*
5	*Housing Management Bodies*
5	*Public Libraries*
4	*School Jurisdictions*
3	*Post-Secondary Educational Institutions*
3	*Police Services*
22	General Public
17	Business/Professional Associations
17	Businesses
11	Self-Governing Professional Associations
6	Other
6	Government Sector
1	Alberta Government Services
1	Information and Privacy Commissioner
128	Total

A list of individuals and organizations that provided written submissions to the Committee is presented in Appendix A.

In addition to receiving written submissions, the Committee also heard 16 oral presentations from various organizations and individuals, including the Office of the Information and Privacy Commissioner, Alberta Government Services and Alberta Registries. A list of individuals and organizations that provided oral presentations to the Committee is presented in Appendix B.

The Committee conducted a comprehensive analysis of the issues raised and formulated a number of recommendations, which are listed in the next section of this report.

The Committee also considered a number of issues where it was determined that no action should be taken. The recommendations for no change to the *Act* are listed in the second section of the report.

COMMITTEE RECOMMENDATIONS

Scope of the *Act*

The Committee considered whether the current scope of Alberta's public sector access and privacy legislation continued to be appropriate. The *FOIP Act* applies to "public bodies," as defined in section 1(p) of the *Act*. Government agencies, boards and commissions are designated as public bodies in the FOIP Regulation in accordance with Government of Alberta policy.

The Committee made the following recommendations:

1. That the FOIP legislation be amended to permit, but not require, the designation of delegated administrative organizations (DAOs) as public bodies, and that the criteria for the designation of DAOs as public bodies be developed in policy.

2. That the criteria for designation as a public body under section 1(p)(ii) be that

   - the government appoints a majority of members to the body or to the governing body of the organization,
   - the body receives the majority of its continuing funding from government, or
   - the government holds a controlling interest in the share capital of the organization; and

   that these criteria be established in the legislation rather than in government policy, and that the criteria for deletion of a public body under section 94(2) be amended to be consistent with the criteria for designation as a public body.

3. That the Government of Alberta, when renegotiating its contract for municipal policing services with the RCMP, consider whether it is appropriate to include the RCMP within the scope of the Alberta *FOIP Act*.

Records and information to which the *Act* applies

The Committee considered whether the current application of the *Act* allowed for appropriate access and privacy protection. Section 4 of the *Act* specifies those classes of records and information where the *Act* does not apply. Section 5 provides for the relationship between the *FOIP Act* and other Acts and cases where there is a conflict or inconsistency.

The Committee made the following recommendations:

4. That the *Traffic Safety Act* be amended to delete the reference to section 40 of the *FOIP Act* as it relates to information concerning individuals (for example, names and addresses collected for operator and vehicle licensing purposes) and prescribe specific criteria for permitting the disclosure of personal information from the motor vehicle registry by the Registrar, and also that a new subsection be added to the *Traffic Safety Act* allowing a decision of the Registrar to be reviewed by the Information and Privacy Commissioner, and finally, that the *FOIP Act* be amended to give the Commissioner the appropriate authority to review the Registrar's decision, investigate complaints, hold an inquiry into the matter, and issue an order.

5. That private parking lot companies not be allowed access to the motor vehicle registry database for the purpose of debt collection.

6. That the *Election Act* be amended, in accordance with the recommendations of the Chief Electoral Officer of Alberta's proposal, to require the creation of a registry of electors.

7. That issues relating to the collection, use, and disclosure of personal information from registries be revisited in relation to the development and implementation of private-sector privacy legislation.

8. That section 4(1)(l)(vi) be amended to read "in an office of the director or a district registrar as defined in the *Vital Statistics Act*."

9. That section 4(1)(l)(vii) be amended to make this exclusion applicable only to registries authorized or recognized by law to which public access is normally permitted.

10. That section 4(1)(n) be amended to parallel section 4(1)(m) by excluding "a personal record of an appointed or elected member of the governing body of a local public body."

11. That consideration be given to the harmonization of the *Freedom of Information and Protection of Privacy Act* and the *Health Information Act* after the initial three-year review of the *Health Information Act*.

12. That any consultation on private-sector privacy legislation include Alberta Treasury Branches and other public bodies engaged in commercial activities.

Access to records

The Committee reviewed the process for obtaining access to records, the balance between the interests of third parties and the rights of applicants, and the operation of the *Act*'s provision for the exercise of rights by guardians. Sections 6 to 15.1 of the *Act* describe the processes for obtaining access to records and sections 30 and 31 address the notification of third parties. Section 84 sets out provisions for the exercise of individual rights or powers under the *Act* by persons other than the individual concerned.

The Committee made the following recommendations:

13. That section 17(2) and section 32(4) be amended to require that public bodies give notice of the disclosure of third-party personal information or confidential business information, without specifying the manner of giving notice.

14. That section 83 (manner of giving notice) be amended to harmonize with the *Electronic Transactions Act*.

15. That the language of section 30 be amended to make it clear that third-party notice is not required if section 29(1) applies to the information.

16. That the Information Management, Access and Privacy division review the definition and interpretation of the word "guardian" in section 84(1)(e) of the *FOIP Act* with a view to recognizing the importance of shared parenting and ensuring harmony with developments in family law that further the goals of shared parenting.

Exceptions to the right of access

The Committee considered whether the *Act*'s mandatory and discretionary exceptions to access were appropriate. Sections 16 to 29 of the *Act* provide for specific and limited exceptions to the general rule of public access to information held by a public body.

The Committee made the following recommendations:

17. That section 16(3)(c), which states that the exception for disclosure harmful to the business interests of a third party does not apply to non-arm's length transactions, be amended to refer to a "public body" rather than to the "Government of Alberta."

18. That section 17(2)(d) (disclosure for research purposes in response to an access request) be deleted.

19. That section 17(2)(j)(ii) be deleted from the *FOIP Act* on the grounds that this provision was added to allow for disclosure of information by health care bodies and that the proclamation of the *Health Information Act* has made the provision unnecessary.

20. That section 17(4) be amended to state that it is presumed to be an unreasonable invasion of personal privacy to disclose personal financial information, including bank account information and credit card numbers.

21. That an expert who provides an opinion under section 18(2) of the *FOIP Act* not be required to enter into an agreement relating to the information disclosed for the purpose of the opinion if the person is a custodian under the *Health Information Act*.

22. That section 24(2), which limits the application of the exception for advice from officials, be amended so that the exception cannot be applied to information in a record that has been in existence for 10 years or more.

23. That a discretionary exception be added to the *Act* to allow a public body to refuse to disclose information where disclosure could be harmful to the competitive ability of a public body conducting a commercial activity.

24. That section 29 be amended to allow a public body to refuse to disclose to an applicant information that is readily available to the public or is available for purchase.

25. That the *Workers' Compensation Act* be amended to permit the Workers' Compensation Board (WCB) to publish only that information contained in its injury prevention register, which is comprised of employer names and their injury

prevention performance information, as determined by the WCB. It is understood that the register would include business information only, not personal information, and that the Board of Directors of the WCB would approve a policy to define the indices, measurements or standards and further circumscribe the publication.

Fees

The Committee considered the range of advice and suggestions provided in the submissions and whether the current fee structure was still appropriate. The Committee made the following recommendations:

26. That the fees for services referred to in section 93(1) of the *Act* be revised as needed to more accurately reflect current costs.

27. That section 93 of the *Act* be amended to refer to a new provision in the Regulation setting out criteria for the waiving of fees consistent with the Commissioner's Order 96-002.

28. That section 93 be amended to clarify that a request for a fee waiver must be made in writing and that the decision of the head must be communicated in writing within 30 days of receiving the request for a fee waiver.

Protection of privacy

The Committee considered whether the privacy provisions relating to the collection, use and disclosure of personal information contained in the *Act* adequately protect the privacy of Albertans. The privacy provisions are set out in Part 2 of the *Act*.

The Committee made the following recommendations:

29. That, for greater certainty, the definition of "personal information" (section 1(n)) be amended to add "genetic information," and to specify that "personal information" includes not only information relating to an individual's fingerprints, but biometric information in general.

30. That sections 36(1) and 37(2) be amended so that an "individual" rather than an "applicant" may make a correction request.

31. That the references in the *Act* to "consent in writing" (section 17(2)(a)) or "consent in the prescribed form" (sections 39(1)(b) and 40(1)(d)) be changed to "consent as prescribed in the regulations"; and that the new rules on the manner of consent be developed, in consultation with the Information and Privacy Commissioner, to

    - state the functional requirements for both oral and written consent,
    - explicitly provide for electronic consent (consent in writing includes electronic consent under the *Electronic Transactions Act*), and
    - set new standards for authentication of identity and notification for oral consent.

32. That the *Act* be amended to allow personal information to be disclosed for the purpose of a common or integrated program or service to organizations that are subject to other privacy legislation.

33. That the *FOIP Act* be amended to allow for the routine use and disclosure of an individual's name, business address, business telephone and facsimile numbers, business e-mail address, and other business contact information.

34. That a provision be added to section 40 of the *Act* to permit a public body to disclose information to the Medical Examiner for the purposes of a fatality inquiry.

35. That, when determining whether a public body may disclose personal information in accordance with the *Act*'s provisions for the protection of personal privacy, the head of the public body shall consider the purpose for which the disclosure is being requested. If, after considering all relevant purposes, the head of the public body believes that disclosure for a particular purpose is appropriate, the public body may disclose personal information for that specified purpose. If disclosure is made to a person under this provision, and if the person uses the personal information for any purpose other than the specified purpose, that person is guilty of an offence and liable to a fine pursuant to section 92 of the *FOIP Act*.

36. That authority for disclosure of personal information in decisions of administrative tribunals be established in the tribunal's governing legislation, and that consideration be given to facilitating the amendment of affected Acts through the use of an omnibus bill in which legislation could be included at the request of individual ministries.

37. That the *Municipal Government Act* be amended to protect the name and mailing address of the property owner from routine disclosure under section 307 of the *Municipal Government Act*.

Disclosure of information in archives

The Committee reviewed proposals for amendments to Part 3 of the *Act* and made the following recommendations:

38. That section 43 be amended to make the reference to disclosure for research purposes apply only to the disclosure under a research agreement, to clarify that references to time periods are based on the date of the record, and to delete the reference to restrictions or prohibitions by other Acts.

39. That the provision for the archives of a post-secondary educational body (section 43(2)) be deleted.

Independent review

The Committee considered a range of comments and suggestions relating to the powers of the Information and Privacy Commissioner and the processes involved in reviews and investigations under the *Act*. Part 4 of the *Act* defines the powers of the Commissioner. Part 5 describes the processes for conducting reviews and investigating complaints under the *Act*.

The Committee made the following recommendations:

40. That the Commissioner review the processes that his Office has established for both mediation, under section 68, and investigations, under section 53(2), and make any necessary changes to the processes after considering the comments made in the public submissions to this Committee.

41. That the *FOIP Act* be amended to provide the Commissioner with the discretion to refuse to conduct an inquiry after considering all of the relevant circumstances.

Administration of the *Act*

The Committee considered whether any changes should be made with respect to the administration of the *Act* and made the following recommendations:

42. That the contents of the FOIP directory include only the name of the public body and contact information for the FOIP Coordinator and that this directory be published only in electronic form on the Freedom of Information and Protection of Privacy Web site.

43. That each public body be responsible for maintaining and publishing a directory of its personal information banks in electronic or other form and that the directory for each public body include the title and location of the personal information bank, a description of the kind of personal information and the categories of individuals whose personal information is included, the authority for collecting the personal information, and the purposes for which personal information is collected, used, or disclosed.

44. That the Information Management, Access and Privacy division investigate and study the merits of developing a database of requests filed with provincial public bodies similar to foilaw.net.

45. That section 89(1) be amended to delete the phrase "within 2 years after this section comes into force."

46. That section 97 be amended to allow for a review of the *Act* to begin within six years of the submission of the report of the present Select Special Committee.

47. That the Information Management, Access and Privacy division continue to provide a training program and related support services to promote an understanding of the *FOIP Act*.

RECOMMENDATIONS FOR NO CHANGE

The Committee considered the following issues and determined that no further action was required or the matter was beyond the scope of the Committee's mandate:

Scope of the *Act*

48. That self-governing professional associations not be made subject to the *FOIP Act*.

49. That private schools and colleges not be made subject to the *FOIP Act*.

Records and information to which the *Act* applies

50. That section 4(1)(g) not be amended to exclude all examination questions from the *FOIP Act*.

51. That section 4(1)(h) not be expanded to include personal information of a student acquired during the process of instruction or for the purpose of enhancing the learning environment.

52. That section 4(1)(h) not be extended to exclude the teaching materials of all public bodies from the *FOIP Act*.

53. That the exclusion of treasury branch records under section 4(1)(r) of the *FOIP Act* remain unchanged.

Access to records

54. That the *FOIP Act* not be amended so that school jurisdictions do not have to process FOIP requests for student records during periods when the schools are closed.

55. That the *FOIP Act* not be amended to permit the head of a public body to refuse or disregard an access request if that head is of the opinion, on reasonable grounds, that the request is frivolous or vexatious.

Exceptions to the right of access

56. That section 16 of the *Act* not be amended to change the balance between the interests of third parties or the rights of applicants.

57. That the exception for confidential third party business information (section 16(1)) not be amended to allow more disclosure of information about government contracts awarded to business and the basis for awarding such contracts.

58. That section 18 (disclosure harmful to individual or public safety) not be amended.

59. That section 19 not be expanded to allow a public body to refuse to disclose evaluative or opinion material compiled for the purpose of determining admission to undergraduate and graduate university programs.

60. That section 19 not be expanded to allow a public body to refuse to disclose peer evaluations of student performance.

61. That the law enforcement exception in the *Act* not be expanded.

62. That a discretionary provision not be added to the *Act* to allow local government bodies to refuse to disclose information to an applicant if the disclosure could reasonably be expected to harm relations between a local government body and other government entities.

63. That section 21(1)(b) not be amended to allow public bodies to refuse to disclose information to an applicant if the disclosure could reasonably be expected to reveal information supplied in confidence by any local public body.

Independent review

64. That the provisions relating to time limits for the review process and the time limit extensions on reviews not be amended.

65. That the Commissioner not have the authority to directly levy a fine for contravention of an offence under the *FOIP Act*.

66. That the Commissioner not have the power to award costs to a party following an inquiry.

APPENDICES

Appendix A: Submissions to the Review Committee

	Name	Organization
1.	John Van Doesburg	Mountain View Regional Water Services Commission
2.	Gregg R. Ulveland	Jubilee Lodge Nursing Home Ltd.
3.	Shari McNab	Sundre Municipal Library
4.	Dorothy Way	Village of Milo
5.	David Brooks	Alberta College of Technical Institute Students' Executive Council
6.	Dorothy Way	Arrowwood Municipal Library
7.	Ave Bella	Elk Island Catholic Schools
8.	Doug Hancock	Coaldale Police Service
9.	Shirley Kerkhof	Handicapped Housing Society of Alberta
10.	Brian Munday	Alberta Land Surveyors' Association
11.	Stephen Alex Lawrance	
12.	Larry Holstead	Town of Rocky Mountain House
13.	Tony Kelly	Alberta Community Development
14.	Tara DeLeeuw	
15.	H. Clifford Chadderton	The War Amputations of Canada
16.	Debbie Whitehead	Evergreens Foundation
17.	Joseph Forsyth	Foippassociates
18.	Ken Porter	Municipal District of Brazeau No. 77
19.	Sean Murphy	Protection of Conscience Project
20.	Jens O. Bagh	
21.	Diane Plowman	Peace Health Region
22.	Barb Goertzen	Coaldale Health Care Centre
23.	Rev. Harold C. Black	Three Hills-Carbon Pastoral Charge
24.	W. D. (Don) Wilkinson	Alberta Association of Private Investigators
25.	O. Brian Fjeldheim	Office of the Chief Electoral Officer
26.	Philip G. Lister, Q.C.	
27.	Sue Hindle	Hinton Municipal Library Board
28.	Wendy Cooper	Consulting Engineers of Alberta
29.	Andrea Belanger	Vision Council of Canada
30.	Doug Owram	University of Alberta
31.	Judith Pidgeon	
32.	Betty Whitney	

	Name	Organization
33.	Martha Kostuch	
34.	John Vogelzang	David Thompson Health Region
35.	Bill Holtby	City of St. Albert
36.	Victoria and Kenneth Wazynick	
37.	Ken Gibson	Alberta Construction Association
38.	David Owen	
39.	Milton Elliot	Clearwater County
40.	R. A. Splane	Agriculture Financial Services Corporation
41.	Charles Hyman	Alberta Teachers' Association
42.	Kevin Miner	Municipal District of Fairview
43.	Don Marshall	Allstate/Pembridge Claims Services and Canadian Insurance Claim Managers' Association, Northern Alberta Chapter
44.	Downey H. (Don) McGladdery	County of Athabasca Library Board
45.	Barbara Clifford	City of Calgary
46.	Mark N. Woolstencroft	
47.	Michele Mulder	Alberta School Boards Association
48.	Lindsay Kelly	Urban Development Institute Alberta, Greater Edmonton Chapter
49.	Jay Miller	
50.	Myra Raugust	Town of Ponoka
51.	Andrew Rogacki	Canadian Association of Direct Response Insurers
52.	Al Schulz	Canadian Chemical Producers' Association
53.	E. Keith Dewey	
54.	Richard W. Covlin	
55.	Larry Presiloski	
56.	Larry Goodhope	Alberta Association of Municipal Districts and Counties
57.	Ruth P. McKinley	Montgomery Legion Place
58.	J. Denise Exton	Strathcona County
59.	Steve Neilly	City of Red Deer
60.	Kerry C. Day	Alberta Treasury Branches
61.	Dianne Nemeth	City of Lethbridge
62.	G. W. Thompson	Alberta Dental Association and College
63.	Pierre Alvarez	Canadian Association of Petroleum Producers
64.	Shirley Swanson	

	Name	Organization
65.	W. D. Pudwell	Medicine Hat School District No. 76
66.	Grant Sauter	Lethbridge Police Service
67.	Nicole Kozak	Lethbridge Police Service
68.	Allan P. Jobson	
69.	Nola and Bruce Stigings	
70.	Grahame Newton	Mount Royal College
71.	Les Wetter	Ducks Unlimited Canada
72.	Steven J. Glover	Institute of Chartered Accountants of Alberta
73.	Brendan J. Croskery	Calgary Board of Education
74.	Karen Labuik	Marigold Library System
75.	Mike Chernichen	Canadian Natural Resources Limited
76.	Marshall Chalmers	Alberta Association of Chiefs of Police
77.	W. A. Rogan	County of Grande Prairie No. 1
78.	Barb Goertzen	Alberta Health Records Association
79.	Bob Myroniuk	Real Estate Council of Alberta
80.	Robert A. Burns	College of Physicians and Surgeons
81.	Terry M. Campbell	Canadian Bankers Association
82.	Karen Prentice	Enmax Corporation
83.	Greg Eberhart	Alberta College of Pharmacists
84.	Fanny Chan	Chinese Benevolent Association of Edmonton
85.	Joan Kaiser	Capital Region Housing Corporation
86.	Jill Ollenberger	
87.	Cynthia Vizzutti	Municipal District of Willow Creek No. 26
88.	A. B. Maurer	City of Edmonton
89.	M. J. O'Brien	ATCO Gas
90.	David Smith	
91.	Mark Ewan	Alberta Mental Health Board
92.	Jim Rivait	Insurance Bureau of Canada
93.	Sterling M. Eddy	CMA Alberta
94.	Paul E. Rogers	Chevron Canada Resources
95.	Laura Nichol-Stiksma	
96.	Neil J. Camarta	Shell Canada Limited
97.	Sandra Birkholz	City of Leduc
98.	Graeme Flint	NOVA Chemicals Corporation
99.	Glenn R. Kosak	EPCOR Utilities Inc.
100.	Charles Hitschfeld	Adsum Consulting Ltd.
101.	Bill Cade	Universities Coordinating Council

	Name	Organization
102.	Larry Wilson	Power Pool of Alberta
103.	David L. Ryan	University of Alberta
104.	Joan F. Taylor	Sierra Systems Group Incorporated
105.	Ellen Coe and Eric Stein	Alberta Occupational Health Nurses Association
106.	Dexter Durfey	Association of School Business Officials of Alberta
107.	Owen Voaklander	Alberta Professional Outfitters Society
108.	W. H. Manyluk	
109.	Pat Harrington	Parkland County
110.	Craig Foley	Calgary Catholic School District
111.	Don Thompson	Law Society of Alberta
112.	Judy Kovacs	Archives Society of Alberta
113.	Valerie Schmaltz	Municipal District of Rockyview No. 44
114.	Jim Hug	Office of the Auditor General
115.	Rick Klumpenhouwer	Calgary Health Region
116.	H. Bruce Reinholz	Business Prospects
117.	Leif Petersen	Detroit Diesel of Canada Ltd.
118.	Honourable Pearl Calahasen	Minister of Aboriginal Affairs and Northern Development
119.	Leonard O. Rodrigues	Alberta Association of Architects
120.	Irene Lewis	Southern Alberta Institute of Technology
121.	Brian Bowles	Leduc County
122.	L. Graham	Alberta College of Optometrists
123.	Lewis and Doris Boehr	
124.	Allaudin Merali	Capital Health
125.	Cindy Ady, MLA	Social Care Facilities Review Committee
126.	Dieter Remppel	
127.	Frank Work, Q.C.	Office of the Information and Privacy Commissioner
128.	Roger Jackson	Alberta Government Services, on behalf of the Government of Alberta

Appendix B: Oral Presentations to the Review Committee

Name	Organization
Brian Fjeldheim, Chief Electoral Officer Bill Sage, Deputy Chief Electoral Officer	Office of the Chief Electoral Officer
Don Wilkinson, President Richard Fraser, Q.C., Counsel	Alberta Association of Private Investigators
H. Clifford Chadderton, Chief Executive Officer	War Amputations of Canada
Michele Mulder, President David Anderson, Executive Director Debra Tumbach, Counsel	Alberta School Boards Association
Robert Clark, Ethics Commissioner and former Information and Privacy Commissioner	Office of the Ethics Commissioner
Pierre Alvarez, President Onno DeVries, Manager – Crude Oil and Fiscal Policy Larry Morrison, Manager – Oil Sands Ray Hansen, General Counsel for Syncrude	Canadian Association of Petroleum Producers
Al Schulz, Regional Director, Alberta	Canadian Chemical Producer Association
Jim Rivait, Vice-President – Prairies, NWT and Nunavut Neil Miller, Vice-President, Northern Alberta, Wawanesa Insurance Don Marshall, Claims Manager, Allstate Insurance	Insurance Bureau of Canada
Judy Kovacs, Secretary, Alberta Society of Archivists	The Archives Society of Alberta
Jo-Ann Munn-Gafuik, University Archivist, Information and Privacy Coordinator Dieter Remppel	The Universities Coordinating Council

Name	Organization
Tara DeLeeuw	
Ken Nielsen, Q.C., President Dave Guenter, Policy Counsel Don Thompson, Executive Director	Law Society of Alberta
Laurie Beveridge, Assistant Deputy Minister Mike Reynolds, Executive Director-Private Agent Services, General Registry Connie Schultz, Data Access Coordinator, Private Agent Services, General Registry	Alberta Registries, Alberta Government Services
Roger Jackson, Deputy Minister, Alberta Government Services	On behalf of the Government of Alberta
Frank Work, Q.C., Alberta Information and Privacy Commissioner Lisa McAmmond, Legal Counsel	Office of the Information and Privacy Commissioner